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Cc: ["Ritter, Ann"; "mchristenson@motleyrice.com"; do Amaral, Paulina; Arbitblit, Donald C.; Paralegal-Opioid; "Track2OpioidDefendants@reedsmith.com"; "mdl2804discovery@motleyrice.com"](#)
Subject: CT2 - Deposition of Dr. Anna Lembke
Date: Wednesday, September 16, 2020 6:28:43 PM
Attachments: [2020.09.16 Ltr re Lembke Depo.pdf](#)
[Errata to Lembke's CT2 report.pdf](#)
[2020.09.16 DR. ANNA LEMBKE CT2 SUPPLEMENTALS MATERIAL CONSIDERED.pdf](#)

Counsel,

Please see attached correspondence, errata, and supplemental materials considered list, including materials in the below link.

//link//

Thank you,

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September 16, 2020

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VIA E-MAIL

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RE: *City of Huntington and Cabell County Commission v. AmerisourceBergen
Drug Corp., et al.*; Case No. 3:17-cv-01362 (S.D.W.V.)

Dear Counsel:

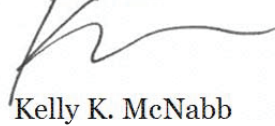
We are in receipt of the Notice of Remote Deposition of Anna Lembke, M.D. to take place on September 17, 2020 at 10:30 ET. Pursuant to Fed. R. Civ. P. 26(b)(2)(C) and Special Master Wilkes's September 15, 2020 ruling during the deposition of Dr. Katherine Keyes, Plaintiffs object to questioning that is duplicative of the testimony and subject matter previously given in *In re: Nat'l Prescription Opiate Lit.*, MDL No. 2804, or in the New York State coordinated proceeding, *In re: Opioid Lit.*, 400000/2017. Plaintiffs do not object to questioning that is specific to issues relating to Cabell County/Huntington. Plaintiffs also do not object to questioning as to any aspects of the CT2 Report that materially add to or differ from the CT1 Report.

Pursuant to Fed. R. Civ. P. 26(a)(2)(E), please find enclosed Dr. Anna Lembke's supplemental materials considered list. Please note, these materials are provided pursuant to the Rule, and not as the basis for any new or different opinions from those set forth in Dr. Lembke's report. Please also find enclosed an errata related to the chart in her report titled Dose and Duration of Prescription Opioids Are the Strongest Risk Factors for OUD.

September 16, 2020

Page 2

Very truly yours,

A handwritten signature in black ink, appearing to read 'Kelly K. McNabb', is written over a faint, light blue rectangular background.

Kelly K. McNabb

DCA/wp

Enclosures

cc: mdl2804discovery@motleyrice.com

Track2OpioidDefendants@reedsmith.com

2040599.2

DR. ANNA LEMBKE

CT2 SUPPLEMENTAL MATERIALS CONSIDERED LIST

1. FDA label - OxyContin. Reference ID: 4326201.
2. Hammer, D. Advocates demand funding, focus on pain as its own disease. Associated Press Writer. July 22, 2006.
3. Landsman-Blumberg PB, Katz N, Gajria K, et al. Health care resource use and cost differences by opioid therapy type among chronic noncancer pain patients. J Pain Res. 2017;10:1713-1722. Published 2017 Jul 21. doi:10.2147/JPR.S130913
4. Linkedin Profile of Adrienne Minecci, <https://www.linkedin.com/in/adrienne-minecci-a23338a8>
5. Linkedin Profile of Bill Whyte, <https://www.linkedin.com/in/bill-whyte-99885bb/>
6. Linkedin Profile of Dominic Lazzaro, <https://www.linkedin.com/in/dominic-lazzaro-proferogroup/>
7. Linkedin Profile of Hazel Doydum, <https://www.linkedin.com/in/hazeldoydum/>
8. Linkedin Profile of Kati Chupa, <https://www.linkedin.com/in/kati-chupa-8a160817/>
9. Moore, P, et al. Combining ibuprofen and acetaminophen for acute pain management after third-molar extractions: Translating clinical research to dental practice. Journal of the American Dental Association. August 2013.
10. Norn, Svend et al. "Opiumsvalmuen og morfin gennem tiderne" [History of opium poppy and morphine]. Dansk medicinhistorisk arbog vol. 33 (2005): 171-84 (English language abstract only).
11. Pew Charitable Trust. Persuading the Prescribers: Pharmaceutical Industry Marketing and its Influence on Physicians and Patients. November 11, 2013. <https://www.pewtrusts.org/en/research-and-analysis/fact-sheets/2013/11/11/persuading-the-prescribers-pharmaceutical-industry-marketing-and-its-influence-on-physicians-and-patients>
12. Washington Post. Drilling into the DEA's pain pill database. January 17, 2020. <https://www.washingtonpost.com/graphics/2019/investigations/dea-pain-pill-database/>

DR. ANNA LEMBKE

CT2 SUPPLEMENTAL MATERIALS CONSIDERED LIST

BATES STAMPED DOCUMENTS

13. ALLERGAN_MDL_03255938
14. ALLERGAN_MDL_03733190
15. ALLERGAN_MDL_03733544
16. JAN-LA-00096814
17. JAN-MS-00311338
18. JAN-MS-00326339
19. JAN-MS-00326341
20. JAN-MS-00785795
21. JAN-MS-00814132
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23. JAN-MS-00864519
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25. JAN-TX-00001490
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30. JAN-TX-00009775
31. JAN-TX-00015731
32. JAN-TX-00022608
33. JAN-TX-00034444
34. JAN-TX-00038692
35. JAN-TX-00039480

DR. ANNA LEMBKE

CT2 SUPPLEMENTAL MATERIALS CONSIDERED LIST

36. JAN-TX-00053505
37. JAN-TX-00059363
38. JAN-TX-00066292
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54. TEVA_MDL_A_08855370

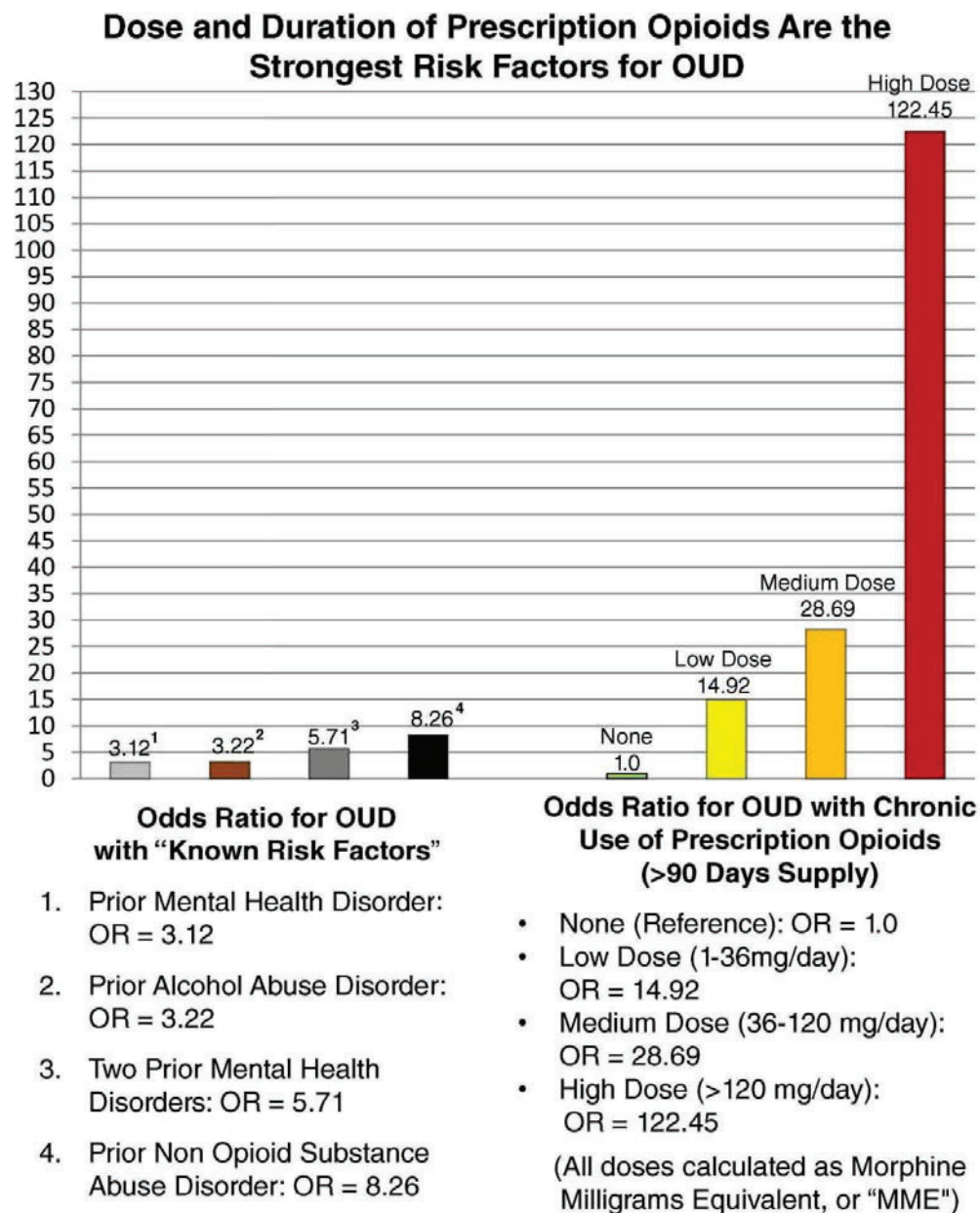
ERRATA TO THE AUGUST 3, 2020 EXPERT REPORT OF ANNA LEMBKE

September 16, 2020

In re: Opioid Litigation, West Virginia Cases No. 3:17-01362

Confidential
Subject to Protective Order

Page 127, chart “Dose and Duration of Prescription Opioids Are the Strongest Risk Factors for OUD”, should be replaced with the following:



Source: Edlund MJ, et al. The Role of Opioid Prescription in Incident Opioid Abuse and Dependence Among Individuals with Chronic Non-Cancer Pain: the Role of Opioid Prescription. *Clin J Pain*. 2014;30(7):557-564, at pp. 557 and 560.